UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

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RANGER OFFSHORE MEXICO, S. DE R.L. DE C.V.,

Plaintiff,

vs.

GRUPO TRADECO, S.A. DE C.V., TRADECO INFRAESTRUCTURA, S.A. DE C.V.

Defendants,

VS.

TRADECO INFRAESTRUCTURA, S.A. DE C.V., TRADECO INFRASTRUCTURE, INC., TRADECO INGENIERIA, S.A. DE C.V., INNOVACIONES TÉCHNICAS EN CIMENTACIÓN, S.A. DE C.V., TCO CONCRETE, INC., TEXAS DEPARTMENT OF TRANSPORTATION

Garnishees.

Case No. 4:15-cv-00635

Admiralty

PROCESS OF MARITIME ATTACHMENT AND GARNISHMENT

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TO: Garnishee, TCO Concrete, Inc., by and through its registered agent, Corporation Service Company, 2711 Centerville Rd., Suite 400, Wilmington, DE 19808

WHEREAS, a Verified Complaint has been filed in the United States District Court for the Southern District of Texas on the 10th day of March, 2015 in a certain action to recover damages due and owing the said plaintiff amounting to approximately US \$19,958,319.04 plus interest and costs, and praying that a Writ of Attachment and Garnishment be issued against the defendant pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and

WHEREAS, this process is issued pursuant to such prayer and pursuant to Rule B(1) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure.

NOW, THEREFORE, we do hereby command you that if said defendant GRUPO TRADECO, S.A. DE C.V. cannot be found within the District, you attach the following up to **US\$19,958,319.04** as per Supplemental Rule E(5):

All property, tangible or intangible, including: assets, accounts, freights, hire payments, monies, charter hire, credits, debts, unmatured debts, debts owed to the defendant, effects, payments for bunkers, cargo, goods or services, bills of lading, cargo and the like belonging to or claimed by the defendant, including monies maintained in accounts for the benefit of, the defendant, GRUPO TRADECO, S.A. DE C.V., within this District to the amount sued for herein be attached pursuant to Supplemental Rule B and the same be attached to pay Plaintiff's damages which are found in the possession of garnishees or which are found in the possession or control of specific garnishees, to wit: TRADECO INFRAESTRUCTURA, S.A. DE C.V., TRADECO INFRASTRUCTURE, INC., TRADECO INGENIERIA, S.A. DE C.V., INNOVACIONES TÉCHNICAS EN CIMENTACIÓN, S.A. DE C.V., TCO CONCRETE, INC., TEXAS DEPARTMENT OF TRANSPORTATION and/or any other garnishee within this district.

WITNESS, the Honorable Judge Melinda Harmon, Judge of said Court, this ____ day of June, 2015.

By:		
(Clerk	
By:	:	
•	Deputy Clerk	

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

RANGER OFFSHORE MEXICO, S. DE R.L. DE C.V.,

Plaintiff,

VS.

GRUPO TRADECO, S.A. DE C.V., TRADECO INFRAESTRUCTURA, S.A. DE C.V.

Defendants,

VS.

TRADECO INFRAESTRUCTURA, S.A. DE C.V., TRADECO INFRASTRUCTURE, INC., TRADECO INGENIERIA, S.A. DE C.V., INNOVACIONES TÉCHNICAS EN CIMENTACIÓN, S.A. DE C.V., TCO CONCRETE, INC., TEXAS DEPARTMENT OF TRANSPORTATION

Garnishees.

Case No. 4:15-cv-00635

Admiralty

INTERROGATORIES TO GARNISHEES

To: Garnishee Tradeco Infraestructura, S.A. de C.V., Garnishee Tradeco Infrastructure, Inc., Garnishee Tradeco Ingenieria, S.A. De C.V., Garnishee Innovaciones Téchnicas en Cimentación, S.A. de C.V., TCO Concrete, Inc., by and through their registered agents.

Pursuant to Rule B(3)(a) of the Supplemental Rules for Admiralty and Maritime Claims & Asset Forfeiture Actions, provide answers under oath to these interrogatories within twenty-one (21) days after service of process.

Respectfully submitted,

Brett J. Young, Attorney in Charge State Bar No. 24042203 SDOT: 566989 1000 Main Street, Suite 2550 Houston, Texas 77002 713/815-7300 (Telephone) 713/815-7301 (Facsimile) brett.young@klgates.com

Of Counsel: Elizabeth A. Gilman State Bar No. 24069265 SDOT: 006637 beth.gilman@klgates.com

K&L Gates, LLP 1000 Main Street, Suite 2550 Houston, Texas 77002 713/815-7300 (Telephone) 713/815-7301 (Facsimile)

ATTORNEYS FOR PLAINTIFF RANGER OFFSHORE MEXICO, S. DE R.L. DE C.V.

Interrogatories 2 | P a g e

CERTIFICATE OF SERVICE

I hereby certify that a true and corre	ect copy of the	e foregoi	ng instrun	nent was	served	on the
following counsel of record on this	day of June	2015 pu	irsuant to	Federal	Rule o	f Civi
Procedure 5 and Local Rule 5, as follows:						

Via Facsimile to 713-228-6605 Michael Bell Jay T. Huffman Blank Rome LLP 700 Louisiana Street, Suite 4000 Houston, Texas 77002-2727 Tel 713.402.7630 Fax 713.228.6605

Via Facsimile to 713-652-5130
Brent Vannoy
Johnson DeLuca Kurisky & Gould, P.C.
4 Houston Center
1221 Lamar Street, Suite 1000
Houston, Texas 77010
Tel 713.652.2525
Fax 713.652.5130

Brett J. Young	_

Interrogatories 3 | P a g e

DEFINITIONS

- 1. "Debts," "credits," and "effects" has the meaning prescribed by Federal Rule of Civil Procedure, Supplemental Rule B.
- 2. "Grupo Tradeco" means Grupo Tradeco, S.A. de C.V.
- 3. "Owned" means the common usage of the word and any possessory interest, including, but not limited to a leasehold interest.
- 4. "Personal Property" means any movable or intangible thing that is subject to ownership and not classified as real property. This includes, but is not limited to, intellectual property, cash, and cash equivalents.
- 5. "Tradeco" means Tradeco Infraestructura, S.A. de C.V.
- 6. "You" means the entity responding to the interrogatory.

Interrogatories 4 | P a g e

INTERROGATORIES

- 1. Identify all debts you owe to Grupo Tradeco, including, but not limited to, the amount of the debt.
- 2. Identify all credits provided for your benefit by Grupo Tradeco, including, but not limited to, the amount or form of the credit.
- 3. Identify all effects of Grupo Tradeco's in your care, custody, or control.
- 4. List the legal name of all of Grupo Tradeco's wholly-owned subsidiaries.
- 5. Provide adequate identifying information for any and all loans you have received from Grupo Tradeco. This shall include, but not be limited to, the amount of all monies transferred to you or to which you are entitled to, any financial institution(s) involved in the transaction, and the date Grupo Tradeco is entitled to demand repayment.
- 6. Provide adequate identifying information for any and all real property owned in whole or in part by Grupo Tradeco to which you have full or partial benefit and the terms applicable to such arrangement.
- 7. Provide adequate identifying information for any and all personal property owned in whole or in part by Grupo Tradeco to which you have full or partial benefit and the terms applicable to such arrangement.
- Identify by account number and current balance all checking, savings, money market,
 CD, investment or other accounts that you are aware of which are in the name of Grupo
 Tradeco.

Interrogatories 5 | P a g e

- 9. If you had at any time in the last year care, custody, control or possession of any funds, credits, receivables, property, monies, effects, insurance proceeds, or obligations of Grupo Tradeco, fully describe such item, state its present custodian and present location, and the date on which this garnishee passed custody, possession, or control of it.
- 10. Identify all debts you owe to Tradeco, including, but not limited to, the amount of the debt.
- 11. Identify all credits provided for your benefit by Tradeco, including, but not limited to, the amount or form of the credit.
- 12. Identify all effects of Tradeco's in your care, custody, or control.
- 13. List the legal name of all of Tradeco's wholly-owned subsidiaries.
- 14. Provide adequate identifying information for any and all loans you have received from Tradeco. This shall include, but not be limited to, the amount of all monies transferred to you or to which you are entitled to, any financial institution(s) involved in the transaction, and the date Tradeco is entitled to demand re-payment.
- 15. Provide adequate identifying information for any and all real property owned in whole or in part by Tradeco to which you have full or partial benefit and the terms applicable to such arrangement.
- 16. Provide adequate identifying information for any and all personal property owned in whole or in part by Tradeco to which you have full or partial benefit and the terms applicable to such arrangement.
- Identify by account number and current balance all checking, savings, money market,CD, investment or other accounts that you are aware of which are in the name of Tradeco.

Interrogatories 6 | P a g e

18. If you had at any time in the last year care, custody, control or possession of any funds, credits, receivables, property, monies, effects, insurance proceeds, or obligations of Tradeco, fully describe such item, state its present custodian and present location, and the date on which this garnishee passed custody, possession, or control of it.

Interrogatories 7 | P a g e